

EXHIBIT T

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8 *Attorney for Plaintiff/Counterdefendant*
9 *Labor Smart, Inc. and Third-Party Defendants*

10 **IN THE UNITED STATES DISTRICT COURT**
11 **IN AND FOR THE DISTRICT OF ARIZONA**

12 **LABOR SMART, INC.**

13 Case No: 2:22-cv-00357-PHX-DJH

14 Plaintiff,
15 vs.

16 **DECLARATION OF DAVID
ANDERSON**

17 JASON AND MELISSA TUCKER.

18 Defendants.

19 (Before the Hon. D. Humetewa)

20 And related Counterclaims
21 and Third-Party Claims.

22 I, David Anderson, declare as follows:

23 1. I was originally contacted by Joe Pavlik to work with Takeover Industries,
24 Inc. ("Takeover") to develop its website, beginning in approximately March 2021.

25 2. In order to create the Takeover website, Takeover purchased a template,
26 which was used to create the Takeover website.

27 3. The Takeover website advertised the sale of its hydrogen water product ("H
28 Water"), which was sold in cans. The website had pictures of the H Water cans, which
identified the ingredients.

29 4. Takeover did not advertise and did not sell a nootropic beverage. Takeover
30 sold a nootropic 2 ounce shot only.

31 5. I also worked with Next Gen Beverages, LLC ("NGB") to develop its
32 website, beginning in approximately June 2023.

6. In order to create the NGB website, NGB purchased a template, which was used to create the NGB website. The template was different and, in my opinion, better than the one used by Takeover.

7. I did not use any information from the Takeover website to develop the NGB website.

8. The NGB website promotes, advertises and sells a 12-ounce nootropic beverage drink. *ct4*

Dated this 8th day of January, 2026.

DAVID ANDERSON

By: /s/ *David Anderson*